



PLAN

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1. SCOPE

The present plan contains accident prevention measures and safety program to be followed and implemented by Acme Interiors and its subcontractor's for Accenture Innovation Center Project

2. ORGANIZATION

This section defines the organizational arrangements required to seamlessly execute the EHS action plan.

Any and all employees of Acme Interiors shall have direct contribution and responsibility on the execution of the company EHS plan, in accordance with their hierarchic level in the organization chart. The essence of the Acme's EHS policy is to set and uphold EHS applications and procedures as a matter of total commitment, and never allow them to be interpreted or perceived as certain paperwork to be followed up by the EHS Manager only.

The project specific EHS plan shall be announced and taken into effect in a meeting with the attendance of all (direct/ indirect) project staff and labor. Acme's project management shall set up a safety Team for the project to enhance, execute and follow up the safety matters.

Safety Team shall include the assigned members of the project management team, and representatives from labor, subcontracting firms and other individuals as deemed appropriate. It shall be responsible of:

- Executing the project specific EHS Action Plan
- Direct and coordinate safety actions
- Manage the communication of safety rules and norms and any modifications/ alterations thereto
- Carry out risk assessments ahead of actual work execution and take appropriate measures

- Investigate safety incidents (if any), analyze root causes and provide feedback to preclude re-occurrence

Under the Safety Team the members of the project management team shall have the following specific responsibilities:

➤ **PROJECT MANAGEMENT**

- Draw up and enforce the environmental, safety plan, including all aspects of welfare, well-being and security.
- Assess potential hazards present and the risks involved throughout, in an ongoing attempt to educate those involved and thus reduce potential risks to the minimum.
- Plan the work in a manner that allocates sufficient time and resources to enable the work to be carried safely and efficiently.
- Control all subcontractors to ensure that they are aware and will comply with the EHS plan and CLIENT's procedures.
- Update the EHS plan as required.
- Update the EHS Construction Risk Assessment as required.
- Establish effective communications throughout the project between all parties.
- Provide adequate security arrangements to augment Client provided security and provide security control in the contractor controlled area.

➤ **PROJECT MANAGER**

The Project Manager's duties shall include:

- To ensure or allocate sufficient resources for the management of the EHS plan.
- To contribute as necessary to the EHS plan.
- To agree and approve the EHS plan.

- The development of this plan and associated documentation ensuring that these are updated or modified to suit changes in conditions.
- Ensure that effective communications are in place that advises all parties of risks, concerns, activities etc. as they are identified.
- Ensure that arrangements for the coordination of all parties to prevent interface risks are in place.
- Ensure an EHS trainer & sufficient number of EHS officer for ongoing activities.

➤ **EHS MANAGER**

The roles and responsibilities are as follows:

- To prioritize and produce a strategy for implementing the various elements of the plan and to ensure that it is being communicated effectively throughout the Project and updating it as required.
- To report to the Senior Management on implementation progress, points of concern and any topical points of issue, on a regular basis.
- To establish and maintain a professional relationship with Client and subcontractor representatives.
- To provide direction as necessary to attain EHS management standards and goals required by the project EHS plan.
- To establish a system of audits that measures the effectiveness of the EHS plan and ensures that the requirements are being effectively communicated throughout the workforce.
- To ensure that sufficient training and induction of all personnel is being provided and maintained.
- Visitor's induction has to be given to all visitors before they are allowed to visit the site.
- To develop the EHS awareness of all personnel employed on the project, via the Safe Worker Observation program, and ensures their participation in all aspects of the health and EHS plan.

➤ **SUBCONTRACTOR(S) MANAGEMENT**

To support and administer the practical implementation of the EHS plan, as appropriate to their scope of work, specifically:

- All of their personnel are fully competent for the work tasks and job functions to be undertaken.
- Adequate arrangements are in place for their own personnel including sufficient tools, changing facilities, administration support etc.
- Joint reviews are carried out for aspects of the work such as operations that may have an impact on project, or complex tasks that require risk assessments and detailed work method statements.
- To effectively coordinate their activities, to eliminate interface problems as far as possible.

➤ **SITE SAFETY ENGINEERS**

The roles and responsibilities are as follows:

- To support the EHS Manager in the practical implementation of the EHS Safety Plan and supporting documents
- Provide support to field supervision; provide technical guidance ensuring industry best practices are adhered to on site as minimum requirements
- Perform periodic inspections, audits in accordance to the project EHS schedule
- Actively participate the project Training and People Based Safety programs
- Attend EHS meetings, with client, supervisors and workers as necessary
- Ensure risk assessments, method statements, JSA and STA are performed periodically throughout the project
- Enhance and participate in EHS communication campaigns
- To support the EHS Manager in the practical implementation of the EHS Safety Plan and supporting documents
- Perform periodic inspections, audits in accordance to the project EHS schedule
- Actively take part in the project Training and People Based Safety program.
- Attend EHS meetings, with client, supervisors and workers as necessary
- Enhance and participate in EHS communication campaigns

➤ **EMPLOYEE / ALL PERSONNEL**

The product of the persons work and that of any persons under his supervision shall itself be acceptably safe anyone who becomes aware of an unsafe situation or action – even if they are not directly involved – shall notify their line manager or the EHS Manager at the earliest opportunity and **STOP THE WORK**

3. EHS POLICY

Acme Interiors is firmly committed to a policy enabling all work activities to be carried out safely, and with all possible measures taken to minimize risks to the health, safety and welfare of workers, contractors, authorized visitors, and anyone else who may be affected by our operations. It is our aim to achieve a safe working environment, which is free of work related accidents and ill health and to this end we will pursue continuing improvements from year to year.

Our Commitments:

The objectives of this EHS policy shall be achieved at our work places by:

- Incorporating EHS consideration in all business decision;
- Promoting a positive EHS culture;
- Ensuring compliance to legal requirements;
- Identifying hazards in the workplace, assessing the risks related to them and implementing Appropriate preventative and protective measures;
- Providing and maintaining safe plant and work equipment;
- Establishing and enforcing safe systems of work;
- Recruiting and appointing personnel who have the skills, abilities and competence equal to their role and level of responsibility;
- Ensuring that tasks given to employees are within their skills, knowledge and ability to perform;
- Ensuring that technical competence is maintained through the provision of refresher training as appropriate;
- Promoting awareness of health and safety and of good practice through the effective communication of relevant information;
- Monitoring our safety performance by regular site inspections by our EHS team.

It is the policy of Acme Interiors Private Ltd to consult all staff and employees on matters of health and safety. All employees are hereby notified of our policy. It is the obligation of all employees to act responsibly and to do everything that is reasonable to prevent injury to themselves, their fellow workers and any other person who may visit their place of work. The senior management shall visibly uphold the principles of this policy and integrate them throughout the operations. The management and supervisory personnel shall be responsible for implementing and maintaining the EHS management system necessary to sustain this policy.

4. INCIDENT INVESTIGATION, REPORTING & RECORD KEEPING

The EHS Manager and Project Manager shall:

- Establish an incident reporting system, appropriate to the project.
- Incidents in the context of this plan may include injuries, violations and incidents e.g.
- Ensure that all injury, damage, near misses and accidents are investigated and root causes are determined, and that subcontractors site supervision are involved in such investigation.
- Examine accident reports, perform statistical analyses and share the results as necessary.
- Prepare Weekly & Monthly EHS report that reflects the overall EHS performance.

All Supervision shall:

- Participate in the investigation of any accident and support the recommendations that are made.

Learning from experience

- A vital part of EHS practice is to learn from experience, using it as a basis to improve the system. To this effect, record keeping provides a measure of how effective the programme is and facilitates identification of areas where improvement will be beneficial. Feedback, both positive and negative needs to be given to project personnel to make them aware of the effectiveness of the programme and, if necessary, raise the level of awareness of particular concerns.

Record Keeping

- Records need to be kept of near misses, hazardous observations, first aid, and injury and lost time accidents per accumulative hours on site. These are to be reported on a weekly & monthly basis

5. SAFETY TRAINING, AWARENESS, MOTIVATION & PENALIZATION

➤ SAFETY OWNERSHIP

Total safety culture cannot exist without a work environment that supports ownership. The expectations of each employee and the role that the individual plays in achieving health, safety and environmental excellence is to be communicated to all employees and is a vital part of the EHS program.

In addition prior to an individual being allowed to work it is essential that they are trained and educated on the project's needs. During the duration of the contract this will be both assessed and audited on a regular basis and where found or identified corrective measures will be put into place. Therefore a comprehensive induction and training program is incorporated for this project.

➤ EHS AWARENESS OF PROJECT PERSONNEL AT OFFICE OR OTHER LOCATIONS

At Project site, the Project Management shall have the responsibility of ensuring that the following are in place as a minimum:

- Fire precautions and appropriate extinguishers
- Persons designated as Safety Officers have hands-on training in use of extinguishers
- Regular fire drills and designated muster areas
- First Aid provision and arrangements for competent persons to administer
- Emergency and nearest Hospital arrangements
- Security provisions to allow secure working environments
- Environmental incident response precautions and equipment
- Project EHS policy, goals and targets
- Incident Reporting & Investigation (including near misses)
- Key Personnel and their contact details

➤ **COMPETENCE AND TRAINING**

A key element in ensuring competency will be the assessment of experienced personnel supplemented by extensive and ongoing training. The project policy is that all personnel associated with the project, at all locations, undergo a mandatory induction, to ensure they are aware of the aims and requirements of the project and the plan for EHS Execution. Emphasis shall be placed on the zero incidents from the outset of the project. Records shall be kept of the names of people receiving EHS training and these records shall be stored on a computerized log. The training program will be tailored to meet the requirements established from a training needs and competency assessment.

A preliminary training matrix for the project shall be prepared for the project’s specific needs. This indicates the type and extent of training courses being planned for each category of worker. It includes senior personnel thorough to site operatives and visitors. Specific groups of personnel who perform safety critical activities, e.g. fire team members, electricians, scaffolders and medics/first aiders will receive detailed and targeted training to ensure a high level of competence and safety awareness.

A SNAPSHOT OF TRAINING MATRIX:

4a. Training Matrix

Training Courses / Trainees	Health & safety Induction	fire safety	Office Safety	Risk Assessment module	First Aid Course	Electrical Safety Course	Understanding the Risk Assessment Process and Signing off	Manual Handling : Lifting Techniques & Principles	Emergency Procedures	Drug & Alcohol Policy	Working Hazards	Environment Hazards	Toolbox Talks
Duration	One Time	Weekly	Monthly	Monthly	Weekly	Weekly	Quarterly	Monthly	Monthly	One Time	Daily	Daily	Daily
Contractors	√	√	√	√	√	√	√	√	√	√	√	√	√
Sub- Contractors	√	√	√	√	√	√	√	√	√	√	√	√	√
Executives	√	√	√	√	√	√	√	√	√	√	√	√	√
Sr. Executives	√	√	√	√	√	√	√	√	√	√	√	√	√
Site Supervisors	√	√	√	√	√	√	√	√	√	√	√	√	√
Foreman	√	√	√	√	√	√	√	√	√	√	√	√	√
Sr. Foreman	√	√	√	√	√	√	√	√	√	√	√	√	√
Engineers	√	√	√	√	√	√	√	√	√	√	√	√	√
Sr. Engineers	√	√	√	√	√	√	√	√	√	√	√	√	√
Asst project Manager	√	√	√	√	√	√	√	√	√	√	√	√	√
Project manager	√	√	√	√	√	√	√	√	√	√	√	√	√
Sr. Project manager	√	√	√	√	√	√	√	√	√	√	√	√	√
Architect	√			√	√	√		√	√	√	√	√	
Visitors	√	√	√						√			√	
Assistant General Manager	√		√	√	√		√	√	√	√			
Head Projects	√		√	√	√		√	√	√	√			
Directors	√		√	√			√	√	√	√			

➤ **EMPLOYEE PROJECT SAFETY, HEALTH & WELFARE ORIENTATION**

All personnel who are to work on the Project shall receive orientation and induction training before starting work. In addition to task/job specific training, which will be provided for personnel where necessary, every EHS Manager shall ensure that everyone for whom they are responsible shall receive information on the following as appropriate for their duties and location.

Records shall be kept of the names of people receiving HSE orientation and these records shall be stored on a computerized log.

Details of EHS Orientation Training given shall be reported in monthly EHS reports.

A SNAPSHOT OF WEEKLY EHS REPORT

WEEKLY EHS REPORT					
Month of: _____ Year: _____					
PROJECT NAME:					
PRAC. MAN:					
CONTRACTOR :					
Contract:		Name		Contract Number	
Project Manager:					
Project OIG Officer:					
Project Engineer:					
WEEKLY OIG PERFORMANCE					
LEADING INDICATORS By Business Area		Weekly Total	Year to Date	LEADING INDICATORS By Business Area	
Wear Misses (E)				Toolbox Talks	
First Aids (E)				Safety Meetings	
Medical Treatments (E)				Orientations	
				Inspections / Observations	
Lost Work Days				Corrective Actions completed	
Restricted / Modified Work Days				Other:	
Reportable Environmental Incidents (E)				Other:	
Hours Worked (Regular)					
Hours Worked (Overtime)					
Total Exposure Hours					
Total Recordable Injury Frequency					
REGULATORY ACTIONS OR INSPECTIONS					
*Did your company experience any regulatory actions or inspections this Week?				<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, provide regulatory agency and description of action taken					
Report Completion Instructions:					
<small>All ACME Interiors Pvt Ltd. sites are required to complete this form on a weekly basis. Each injury/illness should be recorded only once and categorized using the hierarchy on the following page. For example, a Lost-Time injury that involves Medical Treatment, and subsequent Restricted Work shall be categorized as a Lost-Time injury. The Total Recordable Injury Frequency (TRIF) rate is to be calculated using the formula on the following page.</small>					
Name & Sign of EHSO: _____		Name & Sign of PM: _____		Name & Sign of EHSM: _____	
ACME INTERIORS PVT LTD.			ACME/EHS/DOC-16/2015		

A SNAPSHOT OF MONTHLY EHS REPORT

MONTHLY EHS REPORT

Month of: _____ Year: _____

Project Name:		
TWC/ MAIN CONTRACTOR:		
Contact:	Name	Contact Number
Project Manager		
Project EHS Officer		
Project Engineer		

MONTHLY EHS PERFORMANCE					
LAGGING INDICATORS By Business Area	Monthly Total	Year to Date	LEADING INDICATORS By Business Area	Monthly Total	Year to Date
Near Misses (N)					
First Aids (A)			Toolbox Talks		
Medical Treatments (M)			Safety Meetings		
			Orientations		
			Inspections / Observations		
Lost Work Days			Corrective Actions completed		
Restricted / Modified Work Days			Other:		
Reportable Environmental Incidents (R)			Other:		
Hours Worked (Regular)					
Hours Worked (Overtime)					
Total Exposure Hours					
Total Recordable Injury Frequency					

REGULATORY ACTIONS OR INSPECTIONS	
Did your company experience any regulatory actions or inspections this month?	<input type="checkbox"/> Yes <input type="checkbox"/> No <small>If yes, provide regulatory agency and description of action taken</small>

Report Completion Instructions

All ACME Interiors Pvt. Ltd. sites are required to complete this form on a monthly basis. Each injury/illness should be recorded only once and categorized using the hierarchy on the following page. For example, a Lost-Time Injury that involves Medical Treatment and subsequent Restricted Work shall be categorized as a Lost-Time Injury. The Total Recordable Injury Frequency (TRIF) rate is to be calculated using the formula on the following page. Reports are to be submitted to the EHS Dept on 5th business day of the month.

Name & Sign of EHSO: Name & Sign of PM: Name & Sign of EHSM:

ACME INTERIORS PVT LTD.
ACME/EHS/DOC-17/2015

Acme operates the following minimum Orientation Requirements:

EMPLOYER AND EMPLOYEE EHS RESPONSIBILITIES

- EHS methodology, Goals and Objectives
- Education and training programme
- Fire Prevention and Fire Fighting Arrangements
- EHS Audits and Inspections
- Environmental considerations
- Incident response and reporting, hazardous condition and near-miss reporting

Similarly Acme sets the following minimum Orientation Requirements for Site Locations.

These shall include the requirements for office:

- Personal protective equipment
- Incident Investigation and Root Cause Analysis
- Safety incentive programme
- Site Health and Welfare Arrangements
- Mandatory Site Safety, Traffic and Security Regulations
- Construction safety
- Specific EHS training as required, e.g. welding safety, safe operation and maintenance of specific equipment's, fire suppression training etc.

➤ PENALIZATION/ AWARDING

Acme utilizes the three step warning system in its projects, a method which measures the general compliance of employees with EHS Standards, and also spots extreme carelessness or methodical disregard for safety matters. With this system, a company employee who is spotted in a breach of the safety rules is warned orally by its supervisor or reporting line manager. In the second breach a written warning is issued, this time

accompanied by a monetary penalty deemed appropriate for that very project and breach. Any oral or written warning is kept under the project safety log by EHS staff. In case of an unlikely third breach the employment contract of the employee is terminated due to constant safety breaches and increased risk of material/ personal loss incident.

As opposed to the penalties, certain awards are presented to the individuals or teams, scoring the highest EHS audit points in a month. Such awards work as performance increasing motivations, leading to higher EHS awareness, increased rates of compliance and positive safety perception amongst employees.

6. GENERAL SITE RULES

All employees should be in fit condition suitable to perform their site duties, with no sight or hearing problems, arm or leg adverse conditions, circulation complaints or symptoms of nausea, extreme high or low heart rates.

Project management shall ensure allocation of suitable vehicles for emergency evacuation at all times of work execution.

Hand tools, machinery and equipment's shall be properly labeled indicating their suitability for use or need for repair. No tool or equipment without the proper color code tags shall be allowed to the job site and any tool or equipment that shows indications of improper operations, presenting safety risks or malfunctioning shall be collected from the job site for evaluation and repair.

Drug/ Alcohol Abuse: Acme maintains a zero tolerance policy for drug and alcohol abuse. Any employees proven to be under the influence shall immediately be evacuated from the site. Subject employee access shall not be granted until a medical evaluation report. Such employees shall be issued a warning and their condition might be constantly monitored if such abuse is believed to be continuous. Under the Acme's three step warning procedure, abusive employee contracts could be terminated.

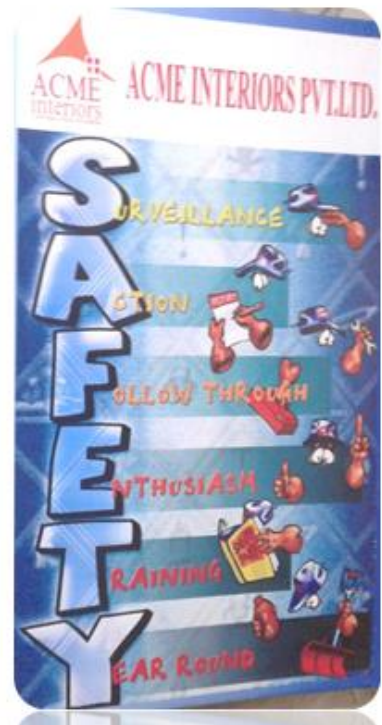
Smoking shall only be permitted in the designated smoking areas, approved by the Client. In such areas, adequate firefighting measures (sand/water/extinguisher or a combination of these) shall be available at all times.

Safety Posters/ Warning Signage: In main access points, gathering points and other spot where deemed necessary, EHS Posters/signage shall be placed, with specific EHS

measures to be taken when entering and working in such zone. Acme employees are bound to comply as indicated on the signage. Such Posters, signage, barrier tape, label etc could not be altered or removed without authorization to do so by EHS staff.

A SNAPSHOT OF SAFETY POSTERS





7. Personal Protective Equipment's (PPE)

Acme is responsible for the provision and use of PPE on site and other appropriate locations for his own personnel and for reasonable numbers of occasional visitors. sub-contractor has a similar responsibility for his own personnel and visitors. Safety gear will be required in accordance with international standards.

Project management and Sub-Contractors' management shall: -

Ensure that all requirements and policies relating to the provision and use of P.P.E is strictly adhered to and that they fully follow the basic Project PPE Assessment.

The following minimum requirements will be adhered to: -

- Safety Shoes, Safety Helmets, Safety Jackets are mandatory at site
- Safety harnesses and lifelines will be used for working at elevations in excess of 1.5 meters or where a fall of this distance is possible.
- Personnel will be educated on the mandatory use and care of respiratory protection for required activities.
- Hearing protection will be worn when exposure to greater noise levels
- Safety gloves, face protection, etc. shall be worn for any activity requiring protection from corrosives, any other potentially hazardous materials.
- Eye protection shall be worn for any activity that presents risk from flying particles, welding process, fumes etc.

Project Management shall:

Agree with the Project EHS Manager and others as necessary on disciplinary actions relating to P.P.E. use.



8. HAZARDOUS MATERIALS

The EHS Manager shall ensure that for all hazardous materials used during the project by Acme or its Subcontractors, or others should follow the below procedures:

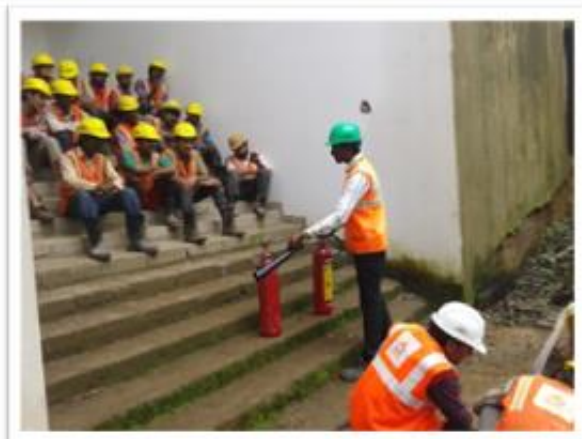
- Prior approval for use is obtained from himself with regard to the application of such material.
- Information on the hazards of the materials is obtained from the manufacturer or supplier and communicated to the users. Employees shall be trained in the safe use of the materials, including personal protective equipment and emergency procedures.
- Written procedures exist for their use and disposal.
- An inventory is kept and made available on demand. Typically the following should be inventoried.
 - ✓ Paints, thinners and solvents
 - ✓ Cleaning agents
 - ✓ Cleaning agents, and sandblasting materials
 - ✓ Greases, oils, and other lubricants
 - ✓ Fuel gases such as acetylene & Propane
 - ✓ Epoxy resins
 - ✓ Sealants
 - ✓ Fuels
 - ✓ Asbestos products such as gaskets and sheeting materials

MSDS (Material Safety Data Sheet) of any material that can be hazardous to human life will be used to train related workforce & all MSDSs will be recorded in file as hardcopy.

9. FIRE PROTECTION / FIRE FIGHTING

Acme's project management shall ensure adequate numbers of fire equipment's are placed in locations selected after the initial site audit, and after Client/ Representative approval. EHS personnel shall be responsible to maintain these equipments and keep them in working condition, with proper logs, labeling and passports. Occasional hot works in other areas shall be commenced after respective hot works permits are issued and mobile extinguishers are made available in close proximity of the working area. Additionally a Fire Protection Plan will be established by contractor, for preventing, detecting and extinguishing fires during construction and commissioning activities.

A SNAPSHOT OF FIRE DRILLS AT SITE



10.WORKING PRACTISES

The permit to work system will control most activities. This will be further developed and controlled with certain areas of work supplemented by written procedure.

For this project written procedures will certainly be required for the following, whilst others may be identified later.

➤ WORKING AT HEIGHTS

- The primary means of achieving safe working conditions when working at heights is to provide adequate and sufficient access and egress arrangements and suitable working platforms at the place of work.
- A toolbox Talk will be given to each person carrying out work at height. Following an assessment of the risks, supervisors will instruct personnel on the instructions and precautions to be followed when working at height.
- Approved full body safety harnesses should only be used as a last resort where conditions make it impracticable to provide a safe working platform

➤ FALL PROTECTION EQUIPMENT

- All personnel working above ground level will be provided with, and will use, appropriate fall protection equipment and PPE. Appropriate regulatory standards must be observed when using fall arrest equipment.
- A competent person must regularly inspect fall protection equipment. It should also be maintained so that it remains satisfactory for use during the construction period. Effective actions must be taken to rectify any defects observed as a result of these inspections.
- Fall protection equipment that has been deployed in a fall must be examined by a competent person and repaired or destroyed, as necessary.
- Fall protection devices and systems will not be used for any other purpose than those for which they are designed.

➤ **SAFETY HARNESES**

- Fall protection in the form of full body safety harnesses and lifelines must be used in situations where it is impracticable to provide primary systems.
- Whenever full body safety harnesses are used they must be secured to a secure anchorage point, running line or arrestor device.
- Safety harnesses and lifelines will be used for working at elevations in excess of 1.5 metres or where a fall of this distance is possible.
- A proper anchor, mounted preferably overhead
- Full body harness using double latch self-locking snap hooks at each connection.

Synthetic fibre lanyards:

- ✓ Shock absorbers must be provided with the harness system in order to reduce the shock loading in the event of a fall.
- ✓ A visual inspection of the fall arrest equipment and system is completed and any equipment that is damaged or has been activated is taken out of service.
- ✓ Person(s) are competent to perform the work.
- ✓ A fixed platform is used with guard or hand rails, verified by a competent person, or the safety harness which restricts to fall must be used.

➤ **SCAFFOLDING:**

The erection and control of scaffolds will be subject to the following:

- A formal written system for requesting scaffolding, supported by assessments of risks and hazards and method statements based on the former.
- Erection specifications to be adopted as per industry Standards
- Standards for boards, tubes and fittings e.g. fire resistant boards

Inspection criteria e.g. should be carried out by a competent, certified scaffolding supervisor.

- ✓ Weekly
- ✓ Before use
- ✓ After alteration.

- ✓ Scafftag or similar system or similar for authorising use working over the side.
- ✓ Strategic placement of storage racks.

➤ **LADDERS**

- Ladders should be used primarily as a means of access, NOT as a working platform.
- If work is required to be carried out from ladders, personnel shall use and wear approved safety harnesses as a means of fall protection.
- Ladders should be suited for the purpose for which it is to be used and free from defects.
- Ladders shall be set on a firm level base. Makeshift props should not be used to gain extra height or to level up stiles.
- Ladders should not cause a hazard by placing them where they may be struck or dislodged. Barriers should be placed around the foot of the ladder where necessary.
- Ladders should, wherever possible, be secured at the top and bottom by lashing, irrespective of whether metal clips or clamps are used. In cases where the ladder is unable to be secured, a person must steady the ladder by standing at the bottom and holding the ladder in place with one foot on the bottom rung. (Permitted only if the ladder is shorter than 5 meters).
- Ladders should not rest against any fragile surface or fitting.
- Ladders must extend at least 1.05 meters above the landing place unless some other suitable handhold is available.
- Only ladder which is manufactured by certified standards should be used and any man made ladders should be certified before beginning usage.

➤ **WORK PERMITS:**

Before conducting work that involves confined space entry, work on energy systems, ground disturbance in locations where buried hazards may exist, or hot work in potentially explosive environments or for any hazard that can arise in any kind of work, a permit must be obtained that:

- Defines the scope of work
- Identifies hazards and assesses risk
- Establishes control measures to eliminate or mitigate hazards
- Links the work to other associated work permits or simultaneous operations

- Is authorized by the responsible person(s)
- Communicates above information to all involved in the work
- Ensures adequate control over the return to normal operations.

Procedures will be implemented for controlling the work via a permit to work system in recognition of the following guidelines:

Agreement and implementation of proformas and types of permits, including:

- Hot work
- Cold work
- Electrical Work Permit
- Confined Space Entry
- Isolation certificates (mechanical - electrical)
- Gas Testing

Sanction to test Issue and revalidation of permits as required by the conditions.

➤ **CONFINED SPACE ENTRY**

Entry into any confined space cannot proceed unless;

- All other options have been ruled out.
- Permit is issued with authorization by a responsible person(s)
- Permit is communicated to all affected personnel and posted, as required
- All persons involved are competent to do the work
- All sources of energy affecting the space have been isolated
- Testing of atmospheres is conducted, verified and repeated as often as defined by the risk assessment
- Stand-by person is stationed
- Unauthorized entry is prevented.

➤ **PRESSURE TESTING:**

Procedures to be established for pneumatic and hydraulic testing:

- Specific Risk Assessments of the planned work are to be completed prior to any operation. These maybe based upon a generic format, but must be specific to the actual operation and location. These shall be signed by the writer and approved prior to actual acceptance.

11.MANAGEMENT REVIEW PROCEDURES

MANAGEMENT REVIEW OF CONSIST OF 3 LEVELS OF REVIEW:

- a) The First level of management review is conducted by the EHS OFFICER
- b) The Second level of management review is conducted by PROJECT MANAGER & PROJECT HEAD
- c) The Third level of review is conducted by DIRECTOR

➤ FIRST LEVEL REVIEW BY EHS OFFICER

Frequency of Review: **Daily & Weekly**

Review consists of:

- Discussion of any internal or registration audit reports completed.
- Summary review of corrective actions.
- Resolution of outstanding corrective actions that require management intervention.
- Decisions related to corrective actions requiring significant resources.
- Review of monitoring information related to progress towards achieving objectives and targets.
- Review of monitoring information related to compliance.
- EHS officer is responsible for scheduling, preparing, and conducting the management review meetings with the program or regional management team. The EHS officer is also responsible for initiating corrective actions that result from decisions made at the management review meeting and maintaining minutes, agendas, and related materials as records.
- The EHS officer is responsible for approving the issue brief and management review agenda and ensuring that adequate time is available for the team to conduct the management review.

➤ **SECOND LEVEL REVIEW BY PROJECT HEAD & PROJECT MANAGER**

Frequency of Review: **Fortnightly**

Review consists of:

- Summary discussion of significant findings from any internal or registration audit completed during the previous three months.
- Trends in non-conformances and corrective actions requests.
- Trends, common objectives, or other issues
- Resolution of outstanding corrective actions that require management intervention.
- Decisions related to corrective actions or objectives requiring significant resources.
- Review of monitoring information related to progress towards achieving objectives and targets.
- Review of monitoring information related to compliance.
- The HOD is responsible for scheduling, preparing, and conducting the management review meetings. The HOD is also responsible for initiating corrective actions that result from decisions made at the management review meeting and maintaining minutes, agendas, and related materials as records.

➤ **THIRD LEVEL REVIEW BY A DIRECTOR**

Frequency of Review: **Monthly**

Review consists of:

- Review of first and second level management review decisions and recommendations.
- Assessing the continuing suitability of the policy statement
- Setting company wise objectives
- Allocating company wise resources
- Summary discussion of significant findings from audits
- Trends, common objectives, or other issues
- Resolution of outstanding corrective actions that require management intervention.
- Decisions related to corrective actions and objectives.
- Review of monitoring information related to objectives.
- Review of annual Department compliance assessment.
- Summary of stakeholder input and how objectives are addressing the needs of interested parties.

FINAL REPORT IS SUBMITTED TO THE MANAGING DIRECTOR